

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 3409, 3737, 29572 & 30712

**CERTIFICATION OF COUNSEL OF PROPOSED ORDER ALLOWING ROSS
RHEINGANS-YOO'S FDU CLAIM AND OVERRULING THE FTX RECOVERY
TRUST'S OBJECTION TO ROSS RHEINGANS-YOO'S FDU CLAIM**

I, Michael J. Joyce, counsel for Ross-Rheingans-Yoo ("Rheingans-Yoo"), hereby certify as follows:

1. On October 30, 2023, the FTX Recovery Trust (the "Trust"),² filed its objection [D.I. 3409] (the "Objection") for an entry of an order disallowing and expunging the remainder of proofs of claim number 5166 and 89710 (together, the "FDU Claim").

2. On June 25, 2025, this Court held a hearing on the Objection wherein the Court overruled the Objection.

3. Counsel for Rheingans-Yoo and counsel for the Trust have reached agreement on a proposed from order (the "Proposed Order") overruling the objection and allowing the FDU Claim. A true and correct copy of the Proposed Order is attached hereto as Exhibit "A".

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The objection to Rheingans-Yoo's claim was originally submitted by the Debtors. The FTX Recovery Trust was established on January 3, 2025, the effective date of the Debtors' confirmed Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates [D.I. 26404-1] the "Plan").

WHEREFORE, it is hereby respectfully requested that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: July 3, 2025

JOYCE, LLC

/s/ Michael J. Joyce

Michael J. Joyce (No. 4563)
1225 King Street, Suite 800
Wilmington, Delaware 19801
Telephone: (302) 388-1944
Email: mjoyce@mjlawoffices.com

-and-

Scott Simon (*pro hac vice*)
GOETZ PLATZER LLP
One Penn Plaza, Suite 3100
New York, NY 10119
Telephone: (212) 695-8100
ssimon@goetzplatzer.com

Counsel to Ross-Rheingans-Yoo